

EXHIBIT A

Hu, Chelsea

From: Alison L. Anderson <alanderson@bsflp.com>
Sent: Friday, August 22, 2025 9:07 PM
To: Santacana, Eduardo E
Cc: Corbo, Isabella McKinley; Samantha Parrish; z/Firebase-Cooley; Google Team WAA
Subject: RE: Process Stip disclosure for Monday Aug. 25

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Eduardo,

Thank you for the call and email. As discussed, we are unlikely to call Bruce Schneier and Chris Ruemmler. While many things can happen in trial and we reserve our rights to make changes, that is our current good faith plan.

Best,
Alison

From: Santacana, Eduardo E <esantacana@cooley.com>
Sent: Friday, August 22, 2025 7:48 PM
To: Alison L. Anderson <alanderson@bsflp.com>
Cc: Corbo, Isabella McKinley <icorbo@cooley.com>; Samantha Parrish <Sparrish@bsflp.com>; z/Firebase-Cooley <zFirebase-Cooley@cooley.com>; Google Team WAA <waagoogleteam@simplelists.susmangodfrey.com>
Subject: Re: Process Stip disclosure for Monday Aug. 25

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Alison,

Thanks for the call about Sam Heft-Luthy. We have talked to him and have explained the situation. We expect he will be available to testify at the end of the court day on Monday, and I will confirm that with you in writing as soon as I can.

This is also to confirm that Plaintiffs will rest after Heft-Luthy, and that Plaintiffs have no more witnesses to disclose. Please confirm my understanding.

Provided that is confirmed, we will prepare to start our case on Tuesday. We both agreed there is no chance Google starts its case on Monday, but in any case, we will make our first witness disclosure tomorrow.

Thanks,
Eduardo

Eduardo E. Santacana

Partner

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Pronouns: he/him

From: Santacana, Eduardo E <esantacana@cooley.com>

Sent: Friday, August 22, 2025 6:07 PM

To: Alison L. Anderson <alanderson@bsflp.com>

Cc: Corbo, Isabella McKinley <icorbo@cooley.com>; Samantha Parrish <Sparrish@bsflp.com>; z/Firebase-Cooley <zFirebase-Cooley@cooley.com>; Google Team WAA <waagoogleteam@simplelists.susmangodfrey.com>

Subject: Re: Process Stip disclosure for Monday Aug. 25

Alison,

Are you calling any witnesses beyond the disclosed witnesses thus far? The note about resting on Tuesday suggests you are not.

Thanks,
Eduardo

On Aug 22, 2025, at 6:01 PM, Alison L. Anderson <alanderson@bsflp.com> wrote:

Isabella,

Yes, this is our current good-faith witness order.

We have had to disclose witnesses early throughout this trial to ensure we meet disclosure deadlines that are THREE days in advance. Simultaneously, we have informed your team repeatedly on our best and honest guesses as to our witness order. This has been especially true for Mr. Heft-Luthy for the exact reasons you raise below. We have confirmed each time your team has asked (some times multiple times from different team members) that we did not think he would be called the next day so that Mr. Heft-Luthy would not need to needlessly travel.

That said, the schedule for Monday depends significantly on how long your team crosses and we have no control over that. It is our view, (and this is the FIRST time we are saying this) that there is a chance we get to Mr. Heft-Luthy on Monday. While the chance may be minimal, we cannot be caught in a situation with no witness available to call.

Please feel free to call me if you have any questions, my cell is (213) 264 – 4577.

Alison

From: Corbo, Isabella McKinley <icorbo@cooley.com>
Sent: Friday, August 22, 2025 5:36 PM
To: Samantha Parrish <Sparrish@bsfilp.com>; z/Firebase-Cooley <zFirebase-Cooley@cooley.com>
Cc: WAA Google Team <waagoogleteam@simplelists.susmangodfrey.com>
Subject: RE: Process Stip disclosure for Monday Aug. 25

Sam,

Does the below reflect the actual order in which you intend to call witnesses? If so, do you realistically expect to reach Mr. Heft-Luthy on Monday? Based on the current pace, it seems highly unlikely that his testimony will be reached that day.

The scheduling of Mr. Heft-Luthy's testimony has become a moving target. This is now the third consecutive day he has been listed on your disclosure. As you know, Mr. Heft-Luthy no longer works for Google. The repeated changes to his expected testimony date are causing significant disruption and placing an undue burden on Mr. Heft-Luthy's schedule. This is particularly problematic given that he is a non-party witness with full-time responsibilities at a different company.

If you do not, in fact, expect to call Mr. Heft-Luthy until Tuesday, please advise us now so that we can avoid further unnecessary disruption to his schedule beyond what has already occurred.

Best,
Isabella

Isabella McKinley Corbo

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Pronouns: she, her, hers

From: Samantha Parrish <Sparrish@bsfilp.com>
Sent: Friday, August 22, 2025 5:13 PM
To: z/Firebase-Cooley <zFirebase-Cooley@cooley.com>
Cc: WAA Google Team <waagoogleteam@simplelists.susmangodfrey.com>
Subject: RE: Process Stip disclosure for Monday Aug. 25

Correction: Please use this link to access the Lasinski demonstrative:

<https://www.dropbox.com/scl/fi/w1mxuyoub9r9g1mfdl0h/Lasinsk-Direct-8-22.pdf?rlkey=a7o6qfjzqqquou4neubmuhnfr&st=oa1pmmsu&dl=0>

Sam Parrish
Associate

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From: Samantha Parrish <Sparrish@bsfllp.com>
Sent: Friday, August 22, 2025 5:03 PM
To: z/Firebase-Cooley <zfirebase-cooley@cooley.com>
Cc: WAA Google Team <waagoogleteam@simplelists.susmangodfrey.com>
Subject: Process Stip disclosure for Monday Aug. 25

Counsel,

Pursuant to the Parties' process stipulation, Plaintiffs make the following disclosures of the witnesses, exhibits, demonstratives, and deposition testimony Plaintiffs anticipate in good faith they will use or offer at trial on **Monday, August 25th**.

Please note, at this point Plaintiffs will likely pass the case to Google on Tuesday.

Disclosure for Monday, August 25			
Witness	Exhibits/Demonstratives		
Rodriguez	Previously disclosed		
Lasinski	PX-138	SS1.1	<ul style="list-style-type: none"> Other Lasinski schedules as may be appropriate Keegan schedules as may be appropriate Alphabet Form 10-K from fiscal year ended Dec. 31, 2022 Keegan Survey Results Q8 Demonstratives, available here: https://www.dropbox.com/scl/fi/sirq707xkfzc1wsn8ajsf/Lasinsk-Directi.pdf?rlkey=4iquja2xhdou372m2w1tgae2n&st=dcp2r0c7&dl=0
	PX-139	SS1.1-II	
	PX-140	SS1.2	
	PX-141	SS1.5	
	PX-142	SS2.1	
	PX-322	SS2.2	
	PX-391	SS2.2-II	
	PX-393	SS3.3	
	PX-395	SS3.4	
	PX-403	SS4.3	
	PX-404	SS4.4	
	PX-405	SS10.1	
	PX-406	SS10.2	
	PX-407	SS10.3	
	PX-417	SS13.1	
	PX-418	SS13.2	
	PX-419	X15.1	
	PX-421		

	PX-422 PX-477 PX-487 PX-479		
Keegan	Previously disclosed		
Miraglia	Previously disclosed		
Kearns	PX-5 PX-10 PX-13 Deposition transcript (designated below)		
Heft-Lufty	-		

Transcript	Date	PgFrom	LnFrom	PgTo
JK. Kearns	2023-02-17	75	13	78
		79	1	79
		80	5	82
		82	23	83
		84	10	84
		84	21	85
		85	17	87
		87	17	87
		87	25	89
		96	23	96
		104	12	104
		104	17	105

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